

**Annual 47 C.F.R. § 64.2009(e) CPNI Certification**  
**EB Docket 06-36**

Annual 64.2009(e) CPNI Certification for 2019 covering the prior calendar year 2018 for Exclusive Group Holdings LLC (FCC 499 Filer ID 832624).

1. Filing Date: 2/27/2019
2. Name of Company(s) covered by this certification: Exclusive Group Holdings LLC ("Company")
3. Form 499 Filer ID: 832624
4. Name of Signatory: Mary E. Todd
5. Title of Signatory: Managing Member
6. Certification:

I, Mary E. Todd, certify that I am an officer of the Company and acting as an agent of the Company, that I have personal knowledge that the Company has established operating procedures that are adequate to ensure compliance with the Commission's CPNI rules. *See 47 CFR § 64.2001 et seq.*

Attached to this certification is an accompanying statement explaining how the Company's procedures ensure that that Company is in compliance with the requirements (including those mandating the adoption of CPNI procedures, training, safeguards, recordkeeping, and supervisory review) set forth in Section 64.2001 *et seq.* of the Commission's rules.

The Company has not taken any actions (i.e., proceedings instituted or petitions filed by a company at either state commissions, the court system, or at the Commission against data brokers) against data brokers in the past calendar year.

The Company has not received any customer complaints in the past calendar year concerning the unauthorized release of CPNI.

The Company represents and warrants that the above certification is consistent with 47 CFR § 1.17, which requires truthful and accurate statements to the Commission. The Company also acknowledges that false statements and misrepresentations to the Commission are punishable under Title 18 of the U.S. Code and may subject it to enforcement action.

Signed 

**Attachments:** Statement Explaining CPNI Operating Procedures  
Statement of Actions Taken Against Data Brokers  
Summary of Customer Complaints

## **EXCLUSIVE GROUP HOLDINGS LLC STATEMENT OF CPNI OPERATING PROCEDURES**

**Applicable from January 1, 2018 to December 31, 2018**

### **Introductory Statement**

Exclusive Group Holdings LLC (the “Company”) is a small, interconnected VOIP wholesale service provider as defined by 47 CFR § 9.3 that provides international-only routing of VOIP services. The Company does its own billing and collection for its customers who are other interconnected VOIP wholesale service providers.

As a interconnected VOIP service provider, the Company is subject to Section 631 of the Communications Act (the “Act”), which restricts its ability to collect or use customer Personally Identifiable Information (PII). See 47 U.S.C. § 551. Exclusive Group Holding’s CPNI policy is consistent with its obligations under Section 631.

### *Customer Proprietary Network Information*

Customer Proprietary Network Information (“CPNI”) is defined in Section 222(1) of the Act as “(A) information that relates to the quantity, technical configuration, type, destination, and amount of use of a telecommunications service subscribed to by any customer of a telecommunications carrier, and that is made available to the carrier by the customer solely by virtue of the carrier-customer relationship; and (B) information contained in the bills pertaining to telephone exchange service or telephone toll service received by a customer of a carrier (except that CPNI does not include subscriber list information).”

Generally, CPNI includes personal information regarding a consumer’s use of his or her telecommunications services. CPNI encompasses information such as: (a) the telephone numbers called by a consumer; (b) the telephone numbers calling a customer; (c) the time, location, and duration of a consumer’s outbound and inbound calls, and (d) the telecommunications and information services purchased by a consumer.

Call detail information (also know as “call records” or “CDRs”) is a category of CPNI that is particularly sensitive from a privacy standpoint and that is sought by pretexters, hackers, and other unauthorized entities for illegitimate purposes. Call detail includes any information that pertains to the transmission of a specific telephone call, including the number called (for outbound calls), the number from which the call was placed (for inbound calls), and the date, time, location and/or duration of the call (for all calls).

### *Use and Disclosure of CPNI is Restricted*

The Company recognizes that CPNI includes information that is personally and individually identifiable, and that privacy concerns have led Congress and the FCC to impose restrictions upon its use and disclosure, and upon the provision of access to it by individuals or entities inside and outside the Company.

## **CPNI POLICIES AND OPERATING PROCEDURES**

1. It is the policy of the Company not to use, disclose, or permit access to Customer Proprietary Network Information ("CPNI"), as defined by the Commission's rules, for any purposes other than the following, all of which are permitted without customer approval pursuant to 47 CFR § 64.2005:
  - a. For the purpose of providing or marketing Company service offerings among categories of service (i.e. local, interexchange, and CMRS) to which the consumer already subscribes from the same carrier, without customer approval;
  - b. For the purpose of providing inside wiring installation, maintenance, and repair services;
  - c. For the purpose of conducting research on the health effects of CMRS;
  - d. For the purpose of marketing services formerly known as adjunct-to-basic services, such as, but not limited to speed dialing, computer-provided directory assistance, call monitoring, call tracing, call blocking, call return, repeat dialing, call tracking, call waiting, caller I.D., call forwarding, and certain centrex features; and
  - e. For the purpose of protecting the rights or property of the carrier, or to protect users of those services and other carriers from fraudulent, abusive, or unlawful use of, or subscription to, such services.
2. Company has established a program to inform and train personnel that they may not use, disclose, or permit access to CPNI for any purpose other than those set forth above, and Company has an express disciplinary process in place for violations. *At present, the Company does not engage in any outbound marketing or research using CPNI and only uses CPNI for the limited purposes of initiating, rendering, billing, and collecting for telecommunications services, and may use CPNI, if necessary, to protect its property rights.*
3. Because Company does not use, disclose or permit access to CPNI except as described above, by definition, it does not need to maintain a record of sales and marketing campaigns that use customers' CPNI, or of instances where CPNI is disclosed to third parties, or where third parties were allowed to access CPNI. If the Company changes its marketing procedures, an appropriate supervisory approval and recordkeeping policy will be instituted.
4. Because Company does not use, disclose or permit access to CPNI except as described above, it does not utilize a notification and customer approval process (i.e. an Opt-Out or Opt-In process). If the Company changes its marketing procedures, an appropriate customer notification process will be instituted.
5. Company has implemented a system by which the status of customer's CPNI approval can be clearly established prior to the use of CPNI.
6. Company has implemented safeguards to discover and protect against attempts to gain unauthorized access to CPNI. Company limits the number of employees and personnel that have access to customer information and call data.
7. Company does not provide online or telephone access to CPNI. Company does not have any customer-facing brick and mortar locations where a customer may request in-store access to CPNI.

8. Company will provide CPNI to law enforcement in accordance with applicable legal requirements pursuant to CALEA.
9. In the event of any breach of CPNI as described in 47 CFR § 64.2011 (the “Rules”), the Company will, as soon as practicable, and in no event later than seven (7) business days, after reasonable determination of the breach, notify federal law enforcement in accordance with the Rules. Company will maintain a record of any such breaches and notifications for a period of at least two (2) years.
10. Company has in place an annual supervisory review process regarding compliance with its CPNI policy.

#### **STATEMENT OF ACTIONS TAKEN AGAINST DATA BROKERS**

1. During calendar year 2018, the Company has instituted the following proceeding, or filed the following petitions, against data brokers before the Federal Communications Commission:

**NONE**

2. During calendar year 2018, the Company has instituted the following proceeding, or filed the following petitions, against data brokers before the various Public Utilities Commissions:

**NONE**

3. During calendar year 2018, the Company has instituted the following proceeding, or filed the following petitions, against data brokers before the federal or state courts:

**NONE**

## **SUMMARY OF CUSTOMER COMPLAINTS**

1. During calendar year 2018, the Company has received the following number of customer complaints related to unauthorized access to, or disclosure of, CPNI due to improper access by Company employees:

**NONE**

2. During calendar year 2018, the Company has received the following number of customer complaints related to unauthorized access to, or disclosure of, CPNI due to improper disclosure to individuals not authorized to receive the information:

**NONE**

3. During calendar year 2018, the Company has received the following number of customer complaints related to unauthorized access to, or disclosure of, CPNI due to improper access to online information by individuals not authorized to view the information:

**NONE**

4. During calendar year 2018, the Company has become aware of the following processes that pretexters are using to attempt to access its CPNI:

**NONE**